

**1<sup>ST</sup> JUDICIAL DISTRICT COURT  
PARISH OF CADDO  
STATE OF LOUISIANA**

**LINDA DAVIS, individually and on behalf  
of all others similarly situated** **Civil Action No. 636,750-A**

**Plaintiff,**

**v.**

**PMG OPCO-GUEST HOUSE, L.L.C.  
d/b/a THE GUEST HOUSE SKILLED  
NURSING AND REHABILITATION  
AND PRIORITY MANAGEMENT  
GROUP, L.L.C.**

**Defendants.**

**NOTICE OF REMOVAL**

On May 31, 2022, Defendants, PMG OPCO-Guest House, L.L.C. d/b/a the Guest House Skilled Nursing and Rehabilitation, and Priority Management Group, L.L.C., filed their Notice of Removal in the United States District Court for the Western District of Louisiana. The 1<sup>st</sup> Judicial District Court is respectfully requested to proceed no further in this action, unless and until such time as the case may be remanded by order of the United States District Court for the Western District of Louisiana. 28 U.S.C. § 1446(d). The Notice of Removal filed in the federal district court is attached hereto as Exhibit “A”.

Dated: May 31, 2022

Respectfully submitted,

**FAIRCLOTH MELTON SOBEL & BASH, LLC**

By: /s/ Jimmy R. Faircloth, Jr.

Jimmy R. Faircloth, Jr. (T.A.)(La. #20645)

[jfaircloth@fairclothlaw.com](mailto:jfaircloth@fairclothlaw.com)

Mary Katherine Price (La. #38576)

[kprice@fairclothlaw.com](mailto:kprice@fairclothlaw.com)

Richard F. Norem, III (La. #38849)

[enorem@fairclothlaw.com](mailto:enorem@fairclothlaw.com)

105 Yorktown Drive

Alexandria, Louisiana 71303

Telephone: (318) 619-7755

Facsimile: (318) 619-7744

***Attorneys for Defendants, PMG OPCO-Guest  
House, L.L.C. d/b/a the Guest House Skilled  
Nursing and Rehabilitation, and Priority  
Management Group, L.L.C.***

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing was served on all counsel of record via e-mail, as follows:

Matthew M. Coman  
Jordan M. Jeansonne  
**Garcia & Artigliere**  
400 Poydras Tower  
400 Poydras Street, Suite 2045  
New Orleans, LA 70130  
[edocs@lawgarcia.com](mailto:edocs@lawgarcia.com)

Stephen M. Huber  
Christopher Whelen  
**Huber Thomas & Marcelle LLP**  
1100 POoydras Street, Suite 2200  
New Orleans, LA 70163  
[stephen@huberthomaslaw.com](mailto:stephen@huberthomaslaw.com)  
[christopher@huberthomaslaw.com](mailto:christopher@huberthomaslaw.com)

Alexandria, Louisiana, this 31st day of May, 2022.

/s/ Jimmy R. Faircloth, Jr.  
OF COUNSEL